

HONORABLE BENJAMIN H. SETTLE

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LEA MOQUETE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GNC HOLDINGS, LLC, a Foreign Limited
Liability Company, and **DOES 1-10**,
inclusive,

Defendant.

Case No. 3:24-cv-05393-BHS

**STIPULATED MOTION AND ORDER
EXTENDING DEADLINES FOR FRCP
26(f) CONFERENCE, INITIAL
DISCLOSURES, AND JOINT STATUS
REPORT**

NOTE ON MOTION CALENDAR:
SEPTEMBER 19, 2024

(Clerk's Action Required)

STIPULATED MOTION

Pursuant to Federal Rule of Civil Procedure 6(b), the Parties hereby stipulate to and jointly request a brief continuance of the early case deadlines set by the Court. In support of this stipulation, the Parties state as follows:

1. The Court issued its Order Regarding Initial Disclosures, Joint Status Report, Discovery, Depositions, and Early Settlement on May 29, 2024, ECF No. 6. Therein, the Court set the following early case deadlines:

a. Deadline for FRCP 26(f) Conference – August 13, 2024

b. Initial Disclosures Pursuant to FRCP 26(a)(1) – August 20, 2024

c. Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) – August 27, 2024

2. On July 10, 2024, Plaintiff filed her Motion to Remand, ECF No. 10.

3. In light of Plaintiff's pending Motion to Remand, on August 14, 2024, the Court reset the early case deadlines to:

a. Deadline for FRCP 26(f) Conference – September 17, 2024

b. Initial Disclosures Pursuant to FRCP 26(a)(1) – September 24, 2024

c. Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) – October 1, 2024

4. Plaintiff believes the Rule 26 conference is premature in light of the pending Motion to Remand.

5. Defendant believes the case is properly in federal court, but recognizes it would be inefficient to proceed while the Court is deciding this threshold issue.

///

///

///

///

6. As such, the Parties respectfully request that the Court extend each of the early case deadlines set forth in the August 14, 2024 Order resetting the early case deadlines by 60 days. This stipulation for an extension of time is made in good faith and is not made for purposes of undue delay.

DATED: September 19, 2024

Respectfully submitted,

/s/Craig J. Ackermann

/s/Breanne Sheetz Martell

Craig J. Ackermann, WSBA #53330
Brian Denlinger, WSBA #53177
Avi Kreitenberg, WSBA #53294
ACKERMANN & TILAJEF, P.C.
2602 North Proctor Street, #205
Tacoma, WA 98406
Phone: (310) 277-0614
Fax: (310) 277-0635
Email: cja@ackermanntilajef.com
bd@ackermanntilajef.com
ak@ackermanntilajef.com

Breanne Sheetz Martell, WSBA #39632
Brian Rho, WSBA #51209
LITTLER MENDELSON, P.C.
One Union Square
600 University Street, Suite 3200
Seattle, WA 98101
Phone: (206) 623-3300
Email: bsmartell@littler.com
brho@littler.com

Attorneys for Defendant

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 20th day of September, 2024.



BENJAMIN H. SETTLE
United States District Judge

CERTIFICATION OF SERVICE

I hereby certify that on September 19, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

DATED this 19th day of September 2024.

ACKERMANN & TILAJEF, P.C.

By: /s/Craig J. Ackermann

Craig J. Ackermann, WSBA #53330

Email: cja@ackermanntilajef.com

Brian W. Denlinger, WSBA #53177

Email: bd@ackermanntilajef.com

Avi Kreitenberg, WSBA #53294

Email: ak@ackermanntilajef.com

ACKERMAN & TILAJEF, P.C.

2602 North Proctor, Suite 205

Tacoma, Washington 98406

Telephone: (310) 277-0614

Facsimile: (310) 277-0635